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8 Attorneys for Defendant
9 **JOHN CRANE, INC.**

FILED
DISTRICT COURT OF GUAM
OCT 11 2005 *HP*
MARY L.M. MORAN
CLERK OF COURT

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF GUAM**

9 **CESS NAVARRO OLMO, RONNIE) CIVIL CASE NO. 05-00025**
10 **PASCUAL FERRERAS,)**

11 **Plaintiff,)**
12 **vs.)**

STIPULATION FOR EXTENSION OF
TIME TO FILE RESPONSIVE
PLEADING; CERTIFICATE OF
SERVICE

13 **A.P. GREEN INDUSTRIES, INC., A.P.)**
14 **GREEN SERVICES, INC., A.W.)**
15 **CHESTERTON COMPANY, AMCHEM)**
16 **PRODUCTS, INC., ARMSTRONG WORLD)**
17 **INDUSTRIES, INC., ASBESTOS CLAIMS)**
18 **MANAGEMENT CORPORATION,)**
19 **BABCOCK & WILCOX COMPANY,)**
20 **COMBUSTION ENGINEERING, INC., DOW)**
21 **CHEMICAL COMPANY, DRESSER)**
22 **INDUSTRIES, INC., FLEXITALLIC, INC.,)**
23 **FLINTKOTE COMPANY, FOSTER)**
24 **WHEELER CORP., GAF CORPORATION,)**
25 **GARLOCK, INC., GEORGIA-PACIFIC)**
CORPORATION, HARBISON-WALKER)
REFRACTORIES CO., HONEYWELL)
INTERNATIONAL, INC., JOHN CRANE,)
INC., KAISER GYPSUM COMPANY, INC.,)
METROPOLITAN LIFE INSURANCE)
COMPANY, OWENS CORNING, OWENS-)
ILLINOIS, INC., PITTSBURGH CORNING)
CORPORATION, QUIGLEY COMPANY,)
INC., UNITED STATES GYPSUM)
COMPANY, VIACOM, INC.,)

Defendants.)

ORIGINAL

1 COME NOW the Plaintiffs CESS NAVARRO OLMO and RONNIE PASCUAL
2 FERRERAS, through counsel, LUJAN, UNPINGCO, AGUIGUI & PEREZ, LLP, by
3 John S. Unpingco, Esq., and Defendant JOHN CRANE, INC., through counsel,
4 MAHER • YANZA • FLYNN • TIMBLIN, LLP, by Louie J. Yanza, hereby stipulate and
5 agree, dependent upon Court approval, that Defendant JOHN CRANE, INC. be
6 provided a 30-day extension to file a responsive pleading to Plaintiffs' First Amended
7 Complaint, filed in above-entitled action on August 16, 2005. Said 30-day extension is
8 owing to the fact that Defendant JOHN CRANE, INC. is a non-resident Defendant and
9 experienced difficult in obtaining local counsel.
10

11 **MAHER • YANZA • FLYNN • TIMBLIN, LLP**
12 Attorneys for Defendant
13 **JOHN CRANE, INC.**

14 Dated: 10/10/05

By: 

LOUIE J. YANZA

16 **LUJAN, UNPINGCO, AGUIGUI & PEREZ, LLP**
17 Attorneys for Plaintiffs
18 **CESS NAVARRO OLMO and RONNIE PASCUAL**
19 **FERRERAS**

20 Dated: 10/10/05

By: 

JOHN S. UNPINGCO, ESQ.

[illegible]

I, Louie J. Yanza, hereby certify that on or before October 11, 2005, I caused to be sent by personal service or by facsimile a copy of the annexed **Stipulation for Extension of Time to File Responsive Pleading; Certificate of Service**, to the following parties at their place of business:

John S. Unpingco, Esq.
LUJAN, UNPINGCO, AGUIGUI & PEREZ, LLP
 Suite 300, Pacific News Building
 238 Archbishop Flores Street
 Hagatña, Guam 96910
 Counsel for Cess Navarro Olmo and Ronnie Pascual Ferreras, Plaintiffs

David W. Dooley, Esq.
DOOLEY ROBERTS & FOWLER, LLP
Suite 201, Orlean Pacific Plaza
865 South Marine Corps. Drive
Tamuning, Guam 96913
Counsel for Garlock and Viacom, Inc.

and, via Registered Mail, to all the parties listed on the attached matrix of Agents of Service of Process.

Dated this 11th day of October, 2005.

MAHER • YANZA • FLYNN • TIMBLIN, LLP
Attorneys for Defendant
JOHN CRANE, INC.

By:

LOUIE J. YANZA

1 A.P. Green Industries, Inc.
2 c/o CT Corporation System
3 120 S. Central Ave.
4 Clayton, MO 63105

5 A.W. Chesterton Company
6 c/o Joseph E. Riley
7 A.W. Chesterton Company
8 225 Fallon Rd.
9 Stoneham, MA 02180

10 Armstrong World Industries, Inc.
11 c/o Corporation Trust Co.
12 1209 Orange St.
13 Wilmington, DE 19801

14 Babcock & Wilcox Company
15 c/o Corporation Trust Co.
16 1209 Orange St.
17 Wilmington, DE 19801

18 Dow Chemical Company
19 c/o Corporation Trust Co.
20 1209 Orange St.
21 Wilmington, DE 19801

22 Flexitallic, Inc.
23 c/o CT Corporation System
24 818 West Seventh St.
25 Los Angeles, CA 90017

Foster Wheeler Corporation
c/o CT Corporation System
818 West Seventh St.
Los Angeles, CA 90017

Georgia-Pacific Corporation
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

Honeywell International, Inc.
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

A.P. Green Services, Inc.
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

Amchem Products, Inc.
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

Asbestos Claims Management Corporation
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

Combustion Engineering, Inc.
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

Dresser Industries, Inc.
c/o CT Corporation System
818 West Seventh St.
Los Angeles, CA 90017

Flintkote Company
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

GAF Corporation
c/o Prentice-Hall Corporation Systems, Inc.
2711 Centerville Road, Suite 400
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Harbison-Walker Refractories Co.
c/o Corporation Trust Co.
1209 Orange St.
Wilmington, DE 19801

Kaiser Gypsum Company, Inc.
c/o CT Corporation System
818 West Seventh St.
Los Angeles, CA 90017

1 Metropolitan Life Insurance Company
2 c/o Corporation Trust Co.
3 1209 Orange St.
4 Wilmington, DE 19801

5 Owens-Illinois, Inc.
6 c/o CT Corporation System
7 818 West Seventh St.
8 Los Angeles, CA 90017

9 Quigley Company, Inc.
10 c/o CT Corporation System
11 111 Eighth Ave.
12 New York, NY 10011

Owens Corning
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1209 Orange St.
Wilmington, DE 19801

Pittsburgh Corning Corporation
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Pittsburgh, PA 15239

United States Gypsum Company
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